

# Exhibit H

1 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

2 IN AND FOR THE COUNTY OF ALAMEDA

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4 ROSALINO REYES and GEMMA REYES,

5 Plaintiffs,

6 vs.

No. RG20052391

7 JOHNSON & JOHNSON, et al.,

8 Defendants.

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13 TELEPHONIC DEPOSITION OF WILLIAM E. LONGO, Ph.D

14 Volume II

15 September 25, 2020

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22 Job No: 4272256

23 Taken before JANICE L. BELCHER

24 CSR No. 12342

25 Pages: 79 - 248

Page 79

1 TELEPHONIC DEPOSITION OF WILLIAM E. LONGO, Ph.D

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3 BE IT REMEMBERED, that pursuant to Notice, and on  
4 the 25th day of September, 2020, commencing at the hour  
5 of 8:02 a.m. Pacific Standard Time, telephonically  
6 before me, JANICE L. BELCHER, a Certified Shorthand  
7 Reporter, appeared WILLIAM E. LONGO, Ph.D, produced as a  
8 witness in said action, and being by me previously  
9 sworn, was thereupon examined as a witness in said  
10 cause.

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14 TELEPHONIC APPEARANCES:

15 For the Plaintiffs:

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behalf of Longs Drug Stores California, Inc.; Safeway,  
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1 back in the time when Walter McCrone taught it himself,  
2 and they were dealing with asbestos added products,  
3 where the chrysotile is these very large bundles, you  
4 know, like the silly examples that Dr. Sanchez uses when  
5 he says this is what it ought to look like.

6 It wasn't until we started, we looked at the  
7 calidria and used that as a standard where the analyst  
8 now knew that it had asbestos in it, but the Calidria  
9 bundles, the size ranges in there are very similar to  
10 the size ranges of the chrysotile in the sample. So  
11 they had to know what to look for. And I don't think,  
12 and so we could train any analyst and they would have to  
13 have decades of experience. And of course you have to  
14 have the kind of setup we have with our PLM scopes, so  
15 this is reproducible.

16 But those MDL samples, to say we looked at them  
17 in 1.550 and didn't find chrysotile, you know, that's a  
18 misrepresentation of what happened.

19 Q. With respect to the Korean or the Philippine  
20 market containers, so you're saying that the table I'm  
21 looking at, Exhibit 10, page 8, Table 1, if we look at  
22 that, so the narrative above where -- I guess, let's  
23 start there, let's start at the narrative.

24 Page 3 of 15, the narrative discussing sample  
25 002, specifically notes, the second sentence there

REPORTER'S CERTIFICATE

I, JANICE L. BELCHER, do hereby certify:

That WILLIAM E. LONGO, Ph.D, in the foregoing deposition named, was present and by me sworn as a witness in the above-entitled action at the time therein specified;

That said deposition was taken before me at said time, and was taken down in shorthand by me, a Certified Shorthand Reporter of the State of California, and was thereafter transcribed into typewriting, and that the foregoing transcript constitutes a full, true and correct report of said deposition and of the proceedings that took place;

IN WITNESS WHEREOF, I have hereunder subscribed my hand this 5th day of October, 2020.



JANICE L. BELCHER, CSR No. 12342

State of California